



THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF THE ATTORNEY GENERAL

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April 9, 2002

Sent via e-mail, hand-delivery, and/or U.S. Mail

Mary L. Cottrell, Secretary
Massachusetts Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, MA 02110

Re: Verizon's Collocation Security Proposal, D.T.E. 02-8

Dear Ms. Cottrell:

Enclosed for filing please find the Attorney General's First Set of Document and Information Requests to Verizon Massachusetts, AG-VZ-1-1 to 1-12, together with a Certificate of Service in the above-referenced proceeding.

Sincerely,

Karlen J. Reed
Assistant Attorney General
Utilities Division
200 Portland Street, 4th Floor
Boston, MA 02114
(617) 727-2200

KJR/kr

Enc.

cc: Joan Foster Evans, Hearing Officer (w/2 enc.)
D.T.E. 02-8 Service List (w/enc.)

**THE COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Investigation by the Department of Telecommunications and Energy on its
own Motion pursuant to G.L. c. 159, §§ 12 and 16, into the collocation
security policies of Verizon New England Inc d/b/a Verizon Massachusetts)

D.T.E. 02-8

**ATTORNEY GENERAL'S
FIRST SET OF DOCUMENT AND INFORMATION REQUESTS
TO VERIZON MASSACHUSETTS**

INSTRUCTIONS

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to Verizon New England d/b/a Verizon Massachusetts (“Verizon MA” or “Company”) or to any individual or entity sponsoring testimony or retained by the Company to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.

6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recordation system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.

13. If you refuse to respond to any Document and Information Request by reason of a claim of privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. Provide two copies of each response.
16. Unless the Request specifically provides otherwise, the term "Company" refers to Verizon MA's intrastate operations and includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.
18. Please provide all responses to requests within 10 business days from receipt of request, as established by the Hearing Officer's Ground Rules dated February 27, 2002.

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**ATTORNEY GENERAL'S
FIRST SET OF DOCUMENT AND INFORMATION REQUESTS
TO VERIZON MASSACHUSETTS**

- AG-VZ-1-1** Please refer to page 22 of the April 5, 2002, Panel Testimony, wherein the panelists state, "Verizon has documented such violations as unauthorized entry into CO areas outside of the CLEC's collocated equipment space." Please give the date and location of each instance of this problem. Please also provide written documentation which supports your assertion of the existence of the violation.
- AG-VZ-1-2** Please refer to page 22 of the April 5, 2002, Panel Testimony, wherein the panelists state, "Verizon has documented such violations as ... theft and vandalism of CLEC equipment resulting from unauthorized access to a CLEC's cage." Please give the date and location of each instance of this problem. Please also provide written documentation which supports your assertion of the existence of the violation.
- AG-VZ-1-3** Please refer to page 22 of the April 5, 2002, Panel Testimony, wherein the panelists state, "Verizon has documented such violations as ... theft and vandalism of Verizon equipment in secured and unsecured areas of the CO." Please give the date and location of each instance of this problem. Please also provide written documentation which supports your assertion of the existence of the violation.
- AG-VZ-1-4** Please refer to page 22 of the April 5, 2002, Panel Testimony, wherein the panelists state, "Verizon has documented such violations as ... cables cut on frames." Please give the date and location of each instance of this problem. Please also provide written documentation which supports your assertion of the existence of the violation.
- AG-VZ-1-5** Please refer to page 22 of the April 5, 2002, Panel Testimony, wherein the panelists state, "Verizon has documented such violations as ... CLEC entry without an authorized identification badge or electronic access card." Please give the date and location of each instance of this problem. Please also provide written documentation which supports your assertion of the existence of the violation.

- AG-VZ-1-6** Please refer to page 22 of the April 5, 2002, Panel Testimony, wherein the panelists state, "Verizon has documented such violations as ...CLEC entry with unauthorized use of another's identification badge or electronic access card." Please give the date and location of each instance of this problem. Please also provide written documentation which supports your assertion of the existence of the violation.
- AG-VZ-1-7** Please refer to page 22 of the April 5, 2002, Panel Testimony, wherein the panelists state, "Verizon has documented such violations as ... doors propped open or locks taped." Please give the date and location of each instance of this problem. Please also provide written documentation which supports your assertion of the existence of the violation.
- AG-VZ-1-8** Please refer to page 22 of the April 5, 2002, Panel Testimony, wherein the panelists state, "Verizon has documented ... such acts of vandalism as broken locks on doors or collocation cages." Please give the date and location of each instance of this problem. Please also provide written documentation which supports your assertion of the existence of the vandalism.
- AG-VZ-1-9** Please refer to page 22 of the April 5, 2002, Panel Testimony, wherein the panelists state, "Verizon has documented ... such acts of vandalism as ... power systems disabled." Please give the date and location of each instance of this problem. Please also provide written documentation which supports your assertion of the existence of the vandalism.
- AG-VZ-1-10** Please refer to page 22 of the April 5, 2002, Panel Testimony, wherein the panelists state, "Verizon has documented such violations as ... unauthorized CLEC testing on Verizon's side of the equipment." Please give the date and location of each instance of this problem. Please also provide written documentation which supports your assertion of the existence of the violation.
- AG-VZ-1-11** Please refer to page 22 of the April 5, 2002, Panel Testimony, wherein the panelists state, "Verizon has documented such violations as ...evidence of drug use on the CO premises." Please give the date and location of each instance of this problem. Please also provide written documentation which supports your assertion of the existence of the violation.
- AG-VZ-1-12** Please refer to page 22 of the April 5, 2002, Panel Testimony, wherein the panelists state, "Verizon has documented ... other improper conduct." Please give the date and location of each instance of this problem. Please also provide written documentation which supports your assertion of the existence of the improper conduct.

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_____)

D.T.E. 02-8

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person
designated on the official service list compiled by the Secretary in this proceeding by either hand
delivery, mail, and/or e-mail.

Dated at Boston this 9th day of April 2002.

Karlen J. Reed
Assistant Attorney General
Utilities Division
200 Portland Street, 4th Floor
Boston, MA 02114
(617) 727-2200